
Appendix C

November 14, 2003 Mn/DOT Cultural Resources Unit Letter to SHPO

July 13 and November 23, 2004 SHPO Response Letters



Minnesota Department of Transportation

Transportation Building

395 John Ireland Boulevard
Saint Paul, Minnesota 55155-1899

May 27, 2004

Mr. Dennis Gimmestad
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Blvd. W.
St. Paul, MN 55101-1906

re: SP 1116-22, TH 371 TH 371 Reconstruction, Nisswa to Pine River, Cass and Crow Wing Counties
SHPO # 2003-1303

Dear Mr. Gimmestad,

We have reviewed the above-referenced undertaking pursuant to our FHWA-delegated responsibilities for compliance with Section 106 of the National Historic Preservation Act, as amended (36 CFR 800).

Your December 5, 2003 review of a cultural resource survey from Mead and Hunt (October 2003) indicates that the following National Register-eligible properties lie within the area of potential effect for this project: the Drew Cabin Complex (CW-NSC-013), the Molstad Property (CW-NSC-014), the Pequot Lookout Fire Tower (CW-SIB-012), the Brainerd and Northern Minnesota Railroad (no number), the Brainerd and Northern Minnesota Railroad Depot in Pine River (CA-PRC-006), and the A.H. Cole Building (CW-PLC-006) in Pequot Lakes. Since that time you have received (letter of April 14th, 2004) the results of the February 27th, 2004 report from the Leech Lake Heritage Sites Program. The report concluded that there are no eligible or potentially eligible archaeological properties within the project's area of effects. This office agrees with those conclusions. The report was also sent to the Heritage Group North for comments on the same date but no comments have been received over the 5+ week period.

Expansion of TH 371 on the existing alignment has been chosen as the preferred alternative through the NEPA process and has been documented in the 2004 preliminary EIS. All of the eligible properties except the Pequot Lakes Fire Tower, are within the APE for the preferred alternative. I am enclosing an excerpt from the scoping document that discusses the Pine River bypass option and the decision to drop that alternative as well as the public notice that documents dropping the Pequot Lakes bypass alternative. The Jenkins east and west bypasses have also been dropped. The only cultural resource in the Jenkins sub-area is the fire tower on the east bypass. Although the TH 371 bypasses have been dropped, a bike path west of Jenkins is still a possibility.

The preferred alternative will have an adverse effect upon the Pine River Depot and will likely result in the relocation of the depot building to the opposite side of the National Register-eligible Brainerd and Northern Minnesota Railroad, now a paved recreational trail. The Pine River bypass option would have avoided the depot but was not selected because of significantly higher construction costs and impacts to natural resources including wetlands, a tamarack marsh, and old growth forest. It would also require taking 27 residences rather than 5 on the preferred alternative. In addition, conversations with Susan Roth of your staff indicated that the depot could be moved to the other side of the tracks without losing its National

Register eligibility. The move was acceptable to preservation interests, MnDOT, and to the City, providing the building could be maintained and used in a compatible capacity in its new location.

There may also be adverse effects to the historic Brainerd and Northern Minnesota Railway (Paul Bunyan Recreation Trail) at various locations associated with the preferred alignment. The proposed trail realignments, except for a segment routed around the west side of Jenkins, will stay within the existing rail r-o-w but will have the effect of leveling portions of the existing railroad grade adversely affecting the physical continuity of the historic rail/trail alignment. The path west of Jenkins will route the recreational traveler off the original rail corridor, and the new highway alignment will result in the modification or obliteration of the current rail alignment in the town of Jenkins. However, there is little potential that the trail project will affect significant archaeological resources. Most of the proposed trail project falls within the previously disturbed TH 371 R/W, the railroad R/W, or R/W of other roads. These areas have been extensively impacted by past construction activities. This condition, coupled with the relatively shallow depth of construction and paucity of archaeological sites found during the original archaeological survey, indicates that there is a low potential for unknown or undisturbed archaeological sites in the APE of the related trail project.

It is the opinion of this office that the preferred alternative will have no adverse effects to the remaining eligible properties in the project APE including the Drew Cabin Complex (CW-NSC-013), the Molstad Property (CW-NSC-014), the Pequot Lookout Fire Tower (CW-SIB-012), and the A.H. Cole Building (CW-PLC-006) in Pequot Lakes. The following paragraphs explain our findings.

Drew Cabin Complex The Drew Cabin Complex is comprised of the main cabin, guesthouse, and boathouse. Our office recommends that the site is eligible under National Register criteria C and A as an example of a recreational property associated with the development of recreation and tourism in Minnesota. The shortest distance between the property and the paved edge of the existing roadway is about 380'. The paved edge of the new roadway will be 100' feet closer or about 280' from the cabin. Between the roadway and the cabin is a high berm (see photo #48) that blocks the view of the current TH 371. The berm will be left in place and will continue to block the view of the new highway (see profile). Between the cabin and the berm is the Paul Bunyan recreation trail that is comprised of the old Brainerd and Northern Minnesota Railroad rail bed. It will not be touched. There will be no construction or changes to elevation between the historic property and the berm. Therefore it is the opinion of our office that there will be no adverse effect to the historic qualities of the structures or the setting of the structures.

Molstad Property This 1913 property, eligible under Criterion C as an example of a vernacular seasonal lake home, was built during the initial period of recreational development in this region. It is located more than 400 feet from the proposed right-of-way of the existing alignment option (see the aerial plan). A marsh and light tree cover lie between the property and the existing/proposed right-of-way. The additional lanes will be built east of (away from) the existing highway that will be used as the southbound lanes. Since the elevation of the highway will stay the same and since the property is located well away from the proposed roadway, there will be no adverse effects to the National Register qualities of the property.

Pequot Lakes Fire Tower This 1934 fire tower is eligible under criteria A and C as a galvanized steel type tower built as part of the depression-era work for the conservation of forest land in Minnesota. It is more than a half-mile from the on-alignment option. The proposed Pequot Lakes bypass has been dropped due to community preference, lower construction costs, and wetland and irrigation field protection issues (see news release dated March 30, 2004), placing the fire tower outside the area of potential effect for the preferred alternative.

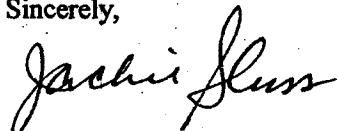
A.H. Cole Building This 1937 community building is eligible under National Register criterion A as the

central location for community activities in Pequot Lakes including government, entertainment, recreation and social history. Plans for reconstruction of TH 371 at this site will not physically encroach on any aspect of the building or setting. The project will not remove trees, diminish the dimensions of the property surrounding the site, affect proper drainage of the site, or change accessibility. The enclosed photos and plan indicate that a curb and gutter will be constructed at the edge of the existing pavement and the highway profile will drop less than one foot. The existing roadway will carry northbound traffic. Two more lanes, separated by a 16' concrete median, will be constructed west, or away from the Cole building, to carry southbound traffic. The relatively shallow existing ditch will be filled in to level with the rest of the building site and an 8' sidewalk added. No existing trees will be impacted by the new sidewalk. These changes will have no adverse effect to the continuing use of the building as a community building or its grounds, including the parking area located north of the building. Nor will the changes affect in any way the characteristics of the property that convey its eligibility to the National Register.

We look forward to consulting with you to develop a Memorandum of Agreement to address the adverse effects of the project to the National Register-eligible Pine River Depot and the Brainerd and Northern Minnesota Railroad. The Federal Highway Administration, St. Paul Office, has been notified of the Heritage Group North's interest in being a consulting party to the mitigation of the Pine River Depot and the City of Pequot Lakes' desire to consult about the affects of the project to the Cole Building. For your convenience, I have enclosed their written comments with this correspondence.

We are providing you with this determination pursuant to the responsibilities given the State Historic Preservation Office (SHPO) by the regulations at 36 CFR 800. If you have any questions regarding this project, please contact me at (651) 296-3065.

Sincerely,



Jackie Sluss, Historian

encs.

cc:

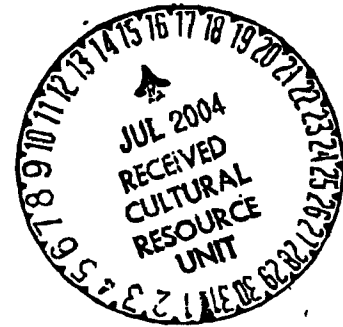
Joe Hudak, Mn/DOT CRU
Mn/DOT CO File
Mn/DOT CRU Project File
Tony Hughes, MnDOT District 3
Chris Hiniker, SEH



July 13, 2004

MINNESOTA HISTORICAL SOCIETY

Ms. Jackie Sluss
Cultural Resources Unit
MN Dept. of Transportation
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899



Re: S.P. 1116-22, T.H. 371
T.H. 371 reconstruction from Crow Wing County Road 18 in Nisswa to Cass
County Road 42 in Pine River
Crow Wing and Cass Counties
SHPO Number: 2003-1303

Dear Ms. Sluss:

Thank you for your recent letter regarding the above referenced project.

We concur with your conclusion that the project will have an adverse effect on the Pine River Depot. We look forward to working with you and the other interested parties in the consultation process to determine ways to reduce/mitigate this effect.

Regarding the assessments of effect for the other historic properties in the corridor:

1. The Drew Cabin Complex and the Molstad Property were both built as lakeshore recreational properties. Given the nature of their surroundings, noise could have an effect on their historical character. Has there been any consideration of noise issues in relation to the proposed project?
2. As you know, the City of Pequot Lakes has expressed concerns with effects to the A.H Cole Building. Your documentation appears to indicate that the project will not affect the building. Before finalizing this assessment, it would be helpful to have the views of the city with regard to this issue.

We look forward to working with you and the other interested parties in the consultation process. Contact us at 651-296-5462 with questions or concerns.

Sincerely,

Dennis A. Gimmestad
Government Programs & Compliance Officer

cc: Alan Johnson, Heritage Group North
Mayor Cathy Malecha, City of Pequot Lakes

November 23, 2004



MINNESOTA HISTORICAL SOCIETY

Ms. Jackie Sluss
Cultural Resources Unit
MN Dept. of Transportation
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899

Re: S.P. 1116-22, T.H. 371 Reconstruction from Nisswa to Pine River
Cass and Crow Wing Counties
SHPO Number: 2003-1303

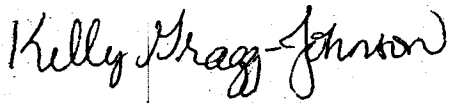
Dear Ms. Sluss:

We have appreciated the opportunity to consult with you and other interested parties with regard to the effects of the above referenced project on historic properties. Following is a summary of our comments on the project at this time.

1. The following historic properties are located within the area of potential effect: the Brainerd and Northern Minnesota Railroad Depot, the Brainerd and Northern Minnesota Railroad Corridor, the Drew Cabin Complex, the Molstad Property, and the A.H. Cole Building. All of these properties meet National Register criteria.
2. We agree that the project will not adversely affect the Drew Cabin Complex, the Molstad Property, and the A.H. Cole Building. We appreciate the additional information you have submitted with regard to noise levels at the Drew and Molstad properties, and we appreciate your attention to avoidance of effects at the A.H. Cole Building in Pequot Lakes.
3. We concur with the determination that the project will have an adverse effect on the Brainerd and Northern Minnesota Railroad Depot and on the Brainerd and Northern Minnesota Railroad Corridor.
4. We look forward to working with you and the other interested parties in developing appropriate mitigation measures for the effect on the depot and the railroad corridor and in completing a memorandum of agreement to stipulate those measures.

Contact our office at 651-296-5462 with questions or concerns.

Sincerely,


Dennis A. Gimmestad
Government Programs & Compliance Officer

cc: Alan Johnson, Heritage Group North
Sandra Peine, City of Pequot Lakes
John Wetrosky, Pine River Chamber of Commerce
Wanda Mongan, City of Pine River